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Examiner: Fred Ehichioya
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Attached hereto is/are the following documents:

- 1) Proposed agenda in 09/783,820

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Proposed agenda in 09/783,820

1. Proposed combination of Lerman and Pence does not teach timestamping a queue (claims 7 and 23). Examiner appears to agree that Pence teaches timestamping a request on a queue, not a queue itself. Examiner says that combination of Pence and Lerman nevertheless teach timestamping a queue, but has cited no portion of Lerman (or Pence) that supports this proposition. (See Office Action, pp. 6, 8).
2. Proposed combination does not teach organizing requests on a queue in increasing order of offset (claims 2, 16, 17, 18, and 24). The Examiner's argument is that an offset is a type of location, and that Lerman teaches "establishing priority" based on location. Even if one assumes that "establishing priority" is the same as organizing requests on a queue, the Examiner has applied the prior art backwards. A species anticipates (or renders obvious) a genus, not the other way around. The Examiner's position is that "offset" is a species of the genus "location," but the Examiner finds that Lerman's asserted teaching of "location" renders the more-specific "offset" to be obvious. This finding inverts the normal sense of how prior art is applied to a claim.
3. Proposed combination does not teach the queue per media feature (claims 1, 21, and 26-30). Applicants explained in the prior response that Lerman teaches certain queues that are associated with disk *drives*. Applicants explained why Lerman's teachings are properly understood to relate to disk drives, and the Examiner has responded by citing the dictionary definition of "disk" to show that a "disk" is a media. Showing what Lerman teaches by resorting to a dictionary, while ignoring what Lerman actually says, does not support the Examiner's position. Lerman clearly teaches that the queues relate to drives. The position that Lerman teaches a queue-per-media instead of a queue-per-drive is simply not supported by the response.